

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON

<p><b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b></p>	<p><b>Master File No. 2:12-MD-02327 MDL 2327</b></p>
<p><b>THIS DOCUMENT RELATES TO: ETHICON WAVE 11 CASES LISTED IN PLAINTIFFS' EXHIBIT A</b></p>	<p><b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b></p>

**DEFENDANTS' NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE FOR  
DEBRA FROMER, M.D. FOR WAVE 11**

Plaintiffs filed a Notice of Adoption (Doc. No. 8486) in the Wave 11 cases identified in Exhibit A to their Notice, adopting their Motion to Exclude or, in the Alternative, to Limit the Opinions and Testimony of Debra Fromer, M.D., in Wave 8 (Doc. No. 6898/6900). Defendants hereby adopt and incorporate by reference their prior *Daubert* response in Ethicon Wave 8, Doc. No. 7018 as their response for Wave 11. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in the Wave 8 response briefing.

Respectfully submitted,

/s/ William M. Gage  
William M. Gage (MS Bar #8691)  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4561  
[william.gage@butlersnow.com](mailto:william.gage@butlersnow.com)

/s/ Susan M. Robinson

Susan M. Robinson (W. Va. Bar #5169)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 24338  
(304) 414-1800  
[srobinson@tcspllc.com](mailto:srobinson@tcspllc.com)

Counsel for Defendants

**CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage  
William M. Gage